REMARKS

Claims 1-4, 6-10, 12, 13, and 15-21 are pending in this application, with claims 1, 7, 13, and 16-18 being independent. Claims 1, 7, 13, and 16 have been amended. Claims 5, 11, and 14 have been canceled. Claims 17-21 have been added. Care has been taken to avoid the introduction of new matter. Favorable reconsideration of the application in light of the following comments is respectfully solicited.

Claim Rejection – 35 U.S.C § 102

Claims 1, 6, 7, 12, 13, 15, and 16 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication Number 2003/0093760 ("Suzuki"). Applicants respectfully traverse this rejection for at least the following reasons.

As amended, claim 1 recites a document structure inspection method comprising the steps of applying a document structure alteration rule, which is stored by storage means, to a first document structure definition written in a document structure definition language to express the structure of a structured document for the purpose of effecting conversion to generate a second document structure definition, and conducting an inspection on an individual element name basis to determine whether a structured document which was produced through a document processing from another structured document is consistent by definition with said second document structure definition generated by applying said document structure alteration rule to said first document structure definition.

The document structure alteration rule includes a replacement rule for setting an element name of a document structure definition to replace therewith corresponding to an element name of a document structure definition targeted for application and an addition rule for setting an

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element name of a document structure definition that is to be added corresponding to an element name contained in a document structure definition targeted for application, wherein said conversion creates said second document structure definition by replacing an element appearing in said first document structure definition and specified by the element name of a document structure definition targeted for application, which is set in said replacement rule, with a corresponding element specified by the element name of a document structure definition to replace therewith, which is set in said replacement rule, and by adding an element specified by the element name of a document structure definition that is to be added, which is set in said addition rule, at a location specified by the corresponding element name targeted for application, which is set in said addition rule, appearing in said first document structure definition.

To illustrate one non-limiting implementation, the present application is characterized by converting a first document structure definition to a second document structure definition using a document structure alternation rule. Thereafter, an inspection process is carried out, where a structured document is examined to see if it is consistent by definition with the second document structure definition after the conversion. To generate the second document structure definition, the conversion focuses on replacing an element name within the first document structure definition with another element name and adding a new element name to the first document structure definition.

Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1, along with its dependent claims, because Suzuki at a minimum fails to describe or suggest a document structure inspection method that includes the step of applying a document structure alteration rule to a first document structure definition written in a document structure definition language to express the structure of a structured document for the purpose of effecting

conversion to generate a second document structure definition, wherein said <u>conversion creates</u> <u>said second document structure definition by</u> *replacing an element appearing in said first* *document structure definition* <u>and specified by the element name of the document structure</u> <u>definition targeted for application, which is set in said replacement rule,</u> *with a corresponding* *element specified by the element name of the document structure definition to replace therewith,* <u>which is set in said replacement rule, and</u> *by adding an element specified by the element name of* *a document structure definition that is to be added,* <u>which is set in said addition rule,</u> *at a* *location specified by the corresponding element name targeted for application,* <u>which is set in</u> <u>said addition rule,</u> *appearing in said first document structure definition,* as recited in claim 1.

Suzuki also fails to describe or suggest a document structure inspection method comprising the step of <u>conducting an inspection on an individual element name basis to</u> <u>determine whether a structured document which was produced through a document processing</u> <u>from another structured document is consistent by definition with said second document</u> <u>structure definition generated by applying said document structure alteration rule to said first</u> <u>document structure definition,</u> as recited in claim 1.

Suzuki, in FIG. 3, discloses a document conversion system that analyzes a first document type definition (D1) and a second document type definition (D2) to extract the differences between the first document type definition (D1) and the second document type definition (D2) and generate a conversion template (T1) reflecting the difference. *See e.g.*, Suzuki at Abstract. Thereafter, the system utilizes the conversion template (T1) to convert a first structured document (F1) associated with the first document type definition (D1) to a second structured document (F3) associated with the second document type definition (D2). *Id.* Apparently, because Suzuki's conversion rule completely incorporates the difference, the second structured

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document (F3) does not necessitate an extra validity verification the conventional technique has needed.

To this end, Suzuki teaches nothing more than converting a first structured document associated with a first document type definition to a second structured document associated with a second document type definition. Suzuki, however, does not describe or otherwise suggest converting <u>a first document structure definition</u> to <u>a second document structure definition</u>, as recited in claim 1. That is, Suzuki does not describe or otherwise suggest bringing one or more new elements into the first document type definition (D1) by, for example, replacing an element and adding to an element within the first document type definition (D1) to generate the second document type definition (D2).

Accordingly, Suzuki fails to describe or suggest a document structure inspection method that includes the step of applying a document structure alteration rule, which is stored by storage means, to a first document structure definition written in a document structure definition language to express the structure of a structured document for the purpose of effecting conversion to generate a second document structure definition, wherein said <u>conversion creates</u> <u>said second document structure definition by *replacing an element appearing in said first*</u> <u>*document structure definition* and specified by the element name of the document structure</u> <u>definition targeted for application, which is set in said replacement rule, with a corresponding</u> <u>element specified by the element name of the document structure definition to replace therewith,</u> <u>which is set in said replacement rule, and *by adding an* element specified by the element name of</u> <u>a document structure definition that is to be added, which is set in said addition rule, *at a*</u> <u>*location specified by the corresponding element name targeted for application*, which is set in</u> <u>said addition rule, *appearing in said first document structure definition*</u>, as recited in claim 1.

Furthermore and as noted above, Suzuki also fails to describe or suggest a document structure inspection method comprising the step of <u>conducting an inspection on an individual element name basis to determine whether a structured document which was produced through a document processing from another structured document is consistent by definition with said second document structure definition generated by applying said document structure alteration rule to said first document structure definition</u>, as recited in claim 1.

Suzuki, in its background section, describes that a conventional document conversion technique converts a first structured document (F1) into a second structured document (F2) using a conversion template (T1), followed by a validity verification process where the second structured document (F2) is verified based on a valid document type definition. *See e.g.*, Suzuki at page 1, paragraph [13] and FIG. 1. In particular, the second structured document (F2) is verified using the document type definition (D2) and <u>it is not verified using second document structure definition generated by applying said document structure alteration rule to said first document structure definition</u>. *Id.*

The Office Action asserts that the second structured document (F2) corresponds to the second document structure definition recited in claim 1. *See e.g.*, Office Action at page 2, line 23 to page 3, line 6. Assuming, *arguendo*, this assertion is correct then Suzuki will teach nothing more than comparing the second structured document (F2) with itself and not with a second document structure definition generated by applying a document structure alteration rule to said first document structure definition. Furthermore, the Office Action asserts that "shaping process" in Suzuki reads on the inspection process recited in claim 1. *See e.g.*, Office Action at page 3, line 18-22. Applicants disagree because the "shaping process" in Suzuki is performed before converting the first structured document (F1) to the second structured document (F3). *See*

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e.g., Suzuki at page 5, paragraph [81] and FIG. 7. As such, the "shaping process" cannot correspond to the inspection process, which is performed after conversion process.

Accordingly, Suzuki fails to describe or suggest a document structure inspection method comprising the step of <u>conducting an inspection on an individual element name basis to determine whether a structured document which was produced through a document processing from another structured document is consistent by definition with said second document structure definition generated by applying said document structure alteration rule to said first document structure definition</u>, as recited in claim 1.

Claims 7 and 13 include features similar to the above-recited features of claim 1. Therefore, for at least the reasons presented above with respect to claim 1, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 7 and 13, along with their dependent claims.

Claim 16 recites a document structure inspection method that includes, among other steps, the steps of: <u>suspending the first inspection</u>, in the case that an inconsistency occurs during the first inspection, and <u>searching a document structure alteration rule library that is a collection of a plurality of document structure alteration rules for an applicable document structure alteration rule based on an inconsistent element name that appears in the structured document;</u> wherein said document structure alteration rule sets a name of a second document structure definition to replace therewith and a name of a second document structure definition that is to be added, corresponding to the inconsistent element name, and <u>conducting a second inspection on an individual element name basis by use of a second document structure definition corresponding to the inconsistent element name in a document structure alteration rule found through the search</u>.

Suzuki does not describe or suggest a document structure inspection method that includes steps of suspending the first inspection and switching the first inspection to the second inspection using the second document structure definition. Notably, the Office Action fails to identify any portions of Suzuki describing this feature and merely rejects claim 16 for the same reasons it rejects claim 1. Should the Examiner continue to reject claim 16, Applicants respectfully request that the Examiner kindly points out relevant portions of Suzuki that the Examiner believes teach this feature.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 6, 7, 12, 13, 15, and 16 under 35 U.S.C. § 102(e) predicated upon Suzuki.

Claim Rejections – 35 U.S.C. § 103

Claims 2-4 and 8-10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Suzuki in view of U.S. Patent Number 7,260,724 ("Dickinson"). Dickinson was relied upon for an alleged teaching that the replacement rule can be applied to an element of the first structure definition corresponding to an encrypted portion of said structured document. As such, Applicants do not believe that the proposed addition of subject matter from Dickinson remedies the shortcomings of Suzuki to describe or suggest the above-recited features of claims 1 and 7. Therefore, Applicants respectfully request reconsideration and withdrawal of this rejection.

New Claims

New claims 17 and 18 include features similar to the above-recited features of claim 16. Therefore, for at least the reasons presented above with respect to claim 16, Applicants respectfully request consideration and allowance of claims 17 and 18.

Dependent Claims

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, Hartness International Inc. v. Simplimatic Engineering Co., 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Because claims 1, 7, and 13 are allowable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon including newly added dependent claims 19-21, are also allowable. In addition, it is respectfully submitted that the dependent claims are allowable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. §§ 102, 103 be withdrawn.

Conclusion

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's

amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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